

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

In re

Case No. 18-30698

Thomas F. Gilbert  
Wendy D. Gilbert

Chapter 13

Debtors

**NOTICE OF MOTION**

MOTION PURSUANT TO:

11 U.S.C. §1329(a)

MOTION BY:

GRADY BK, PLLC  
Attorney for the Debtor

DATE, TIME & PLACE:

June 29, 2023 at 10:00am  
Federal Courthouse, 100 Clinton Street,  
Syracuse, NY

SUPPORTING PAPERS:

Attorney Affirmation  
Debtor Affidavit

RELIEF REQUESTED:

Modify Debtor's Chapter 13 Plan

Dated: May 22, 2023

GRADY BK, PLLC

BY: /s/ Jessica Grady  
Jessica G. Grady, Esq.  
Bar Roll #512322  
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Liverpool, NY 13088  
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**IF YOU INTEND TO OPPOSE THIS MOTION, WRITTEN OPPOSITION MUST BE FILED WITH THE CLERK OF THE COURT AND SERVED ON MOVANT'S COUNSEL AT LEAST SEVEN (7) DAYS PRIOR TO THE RETURN DATE. IF YOU DO NOT FILE AND SERVE WRITTEN OPPOSITION, NO HEARING WILL BE HELD ON THE RETURN DATE AND THE COURT MAY GRANT THE MOTION AS UNOPPOSED.**